REMARKS

I.   INTRODUCTION

Claims 1, 8, 9 and 14-24 have been amended. Claims 1-24 remain pending in the present application. The applicants respectfully submit that no new matter has been added. In view of the preceding amendments and the following remarks, it is respectfully submitted that all of the presently pending claims are allowable.

II.   THE 35 U.S.C. §102(E) REJECTIONS SHOULD BE WITHDRAWN

Claims 1-5, 7, 11 and 14 stand rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,331,817 to Goldberg (hereinafter "the Goldberg reference"). The Goldberg reference discloses a system which utilizes a transceiver to track personal property tagged with trackable electronic devices. *Goldberg reference*, Abstract. The Goldberg reference describes an organizer that communicates with a plurality of tagged objects. *Id.* at col. 2, lines 3-17. The organizer includes sets of associated objects which are to be queried upon events that are programmed by the user, for example, when the user leaves the house. *Id.* at col. 3, line 37 to col. 4, line 13. Thus, the organizer must detects its environment in order to activate the query of the objects.

In contrast, claim 1 recites a system for tracking portable devices which includes "a memory arrangement storing identifier data corresponding to the portable devices, *the identifier data including status information*" and "a portable device control system coupled to the processor and controlled based on the comparison of the stored identifier data to the identifier data retrieved from the replies, wherein *the status information on the memory arrangement is updated based on the comparison of the stored identifier data to the retrieved identifier data.*"

As described in the specification of the present invention, the system maintains a record for each device to be tracked, the record including status information such as whether the device is activated. *Specification*, ¶ [0008]. Furthermore, the system continuously tracks devices in the secured area. *Id.* at ¶ [0012]. The memory arrangement of the present invention stores

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status information for each of the devices which is to be tracked in the secure area to determine whether the device is to be tracked and records changes to this status. The recorded device status allows the system to determine whether the device should be tracked and keep a continuously updated status for each of the tracked devices.

The organizer of the Goldberg reference does not store status information as contemplated by the present invention. The Goldberg reference organizer stores the set information as described above which signals the organizer to query for objects in the set based on the event experienced by the organizer, *e.g.*, leaving a set location. This set information in the Goldberg reference is not updated based on a *"data retrieved from the replies"* of the tracked devices as recited in claim 1. There is no description in the Goldberg reference where any signals which may be received from the tracked objects update a status of the tracked object stored in a memory of the organizer.

Furthermore, there is no description or suggestion of storing status information for the tracked objects in the system as described in the Goldberg reference. In fact, there would be no reason to store and update status information in the Goldberg reference because the query by the organizer is triggered by a transient event, *e.g.*, leaving a set location. Thus, the system of the Goldberg reference gives a single indication of whether the tracked objects in the set are within the required range of the organizer. The object is either present or not present at the time the organizer queries for the objects. There would be no need for the system described by the Goldberg reference to store status information on the tracked objects.

Accordingly, the Goldberg reference neither teaches nor suggests "a memory arrangement storing identifier data corresponding to the portable devices, *the identifier data including status information*" and "a portable device control system coupled to the processor and controlled based on the comparison of the stored identifier data to the identifier data retrieved from the replies, wherein *the status information on the memory arrangement is updated based on the comparison of the stored identifier data to the retrieved identifier data*" as recited in claim 1. Thus, it is respectfully submitted that the rejection of claim 1 and the claims depending therefrom (claims 2-5, 7 and 11) should be withdrawn.

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Similarly, claim 14 recites a method of tracking portable devices containing similar limitations as those in claim 1. Specifically, claim 14 recites "retrieving from each reply to the inquiries received by the security monitor device, identifier data uniquely identifying a particular one of the portable devices which generated the reply and comparing the identifier data to stored identifier data, *the stored identifier data including status information*" and "controlling operation of a portable device control system based on the comparison of the stored identifier data to the identifier data retrieved from the replies, wherein *the status information of the stored identifier data is updated* based on the comparison of the stored identifier data to the retrieved identifier data." Therefore, for at least the reasons discussed in regard to claim 1, it is respectfully submitted that claim 14 is not anticipated by the Goldberg reference and the rejection of claim 14 should also be withdrawn.

III.   THE 35 U.S.C. §103 REJECTIONS SHOULD BE WITHDRAWN

Claims 8-10 stand rejected under 35 U.S.C. §103(a) as being unpatentable over the Goldberg reference in view of U.S. Patent No. 5,801,618 to Jenkins ("the Jenkins reference"). Claims 6, 13, 16-20, 23-24 stand rejected under 35 U.S.C. §103(a) as being unpatentable over the Goldberg reference in view of U.S. Patent No. 5,664,113 to Worger et al. ("the Worger reference"). Claims 21-22 stand rejected under 35 U.S.C. §103(a) as being unpatentable over the Goldberg reference in view of the Worger reference and further in view of the Jenkins reference. Claim 15 stands rejected under 35 U.S.C. §103(a) as being unpatentable over the Goldberg reference in view of the Worger reference and further in view of U.S. Patent No. 5,686,902 to Reis et al. ("the Reis reference"). Finally, claim 12 stands rejected under 35 U.S.C. §103(a) as being unpatentable over the Goldberg reference in view of the Reis reference.

As discussed above, the Goldberg reference does not teach or suggest all the limitations of independent claims 1 and 14. None of the Jenkins reference, the Worger reference, nor the Reis reference cure the deficiencies described for the Goldberg reference. Because claims 6, 8-10, 12, 13, 15-24 depend from and, therefore, include all of the limitations of corresponding claims 1 and 14, it is respectfully submitted that these claims are also allowable over the cited references.

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IV.   CONCLUSION

In light of the foregoing, the applicants respectfully submit that all of the pending claims are in condition for allowance. All issues raised by the Examiner have been addressed, an early and favorable action on the merits is earnestly solicited.

Respectfully submitted,

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